

To: Burns, Francis[Burns.Fran@epa.gov]
From: Linden, melissa
Sent: Wed 3/12/2014 4:53:42 PM
Subject: Charleston WV Chemical Leak Update

At Freedom Industries the completion of installing the perforated pipe and gravel to formalize the sump outside the containment area was done on March 11, 2014. The facility continues to pump water from outside the containment wall in the new formal sump, the interceptor trench, the oil/water separator, and the sump within the containment area along the back wall. The facility has pumped all of the liquid material that was in the heel of Tank 393 out, now just a semi-solid heel of fatty acid is left. WVDEP has approved adding caustic soda to liquefy the fatty acid heel in Tank 393, so that it can be pumped out and sold. Approximately 6 tanker truck loads are left in Tank 393. The facility continues to pump out the heel in Tank 394 which is also fatty acids. Today, during the pumping from Tank 394 a mechanical issue occurred causing the hose to have a blow-out, spilling liquid fatty acids onto the ground. The facility's contractor placed absorbent down and began the clean-up. The facility is also continuing to work on cleaning tanks when the temperature is warm enough. The facility's contractor collected a sample of RDC-777 from Tank 203 for EPA CID today (March 12, 2014). The facility does anticipate having all material removed from the tanks on-site by March 15, 2014 to comply with the WVDEP order. Dry products stored in the garage of the facility were not included in the order and are being sold as orders come in, these products are sealed bags of polymers.

Freedom Industries anticipates all waste water being stored at the POCA Blending Facility (POCA) will be transported to Waste Management DSI by the end of the week. Then cleaning of the baker tanks will begin at POCA and the all MCHM/PPH product will be contained in double wall baker tanks.

The facility's contractor sampled both the sump outside the containment wall and the interceptor trench for the weekly trend analysis. Locks were placed on the monitoring wells today (March 12, 2014).

The facility has submitted the draft tank decommission plan to WVDEP and it includes the notification that 3 of the gaskets tested last week for asbestos came back positive. The facility anticipates having the draft remediation plan by the end of the week to WVDEP, it will summarize all actions taken to date and the plan moving forward.

The facility is still pursuing tests for on-site treatment of the waste water. The two possible options are the bio-activated sludge with ultra-filtration and an advanced oxidation process. The

facility is still asking WVDEP to consider a direct discharge permit if the wastewater after on-site treatment shows non-detectable levels of MCHM/PPH. In addition, WVDEP is meeting with Salt Rock PSD WWTP near Hurricane, WV to discuss whether they would be able to accept the wastewater from the facility.